

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS
BOSTON DIVISION**

ROBERT VON SMITH,
TERRY HOPE,
RAMEZ TOHME,
MATTHEW PITTARD,
MATTHEW ALLENDE,
JASON MOLLENBRINK

Case No. 20-11143

Plaintiffs,
v.

H.E. SHEIKH KHALID BIN HAMAD
BIN KHALIFA AL THANI *et al*,

Defendants.

DECLARATION OF TERRY HOPE

I, Terry Hope, state under the pains and penalties of perjury, the following:

1. The declarations of my affidavit are in support of Plaintiffs' Opposition to Defendants' Motions to Dismiss the Complaint for improper service, lack of personal jurisdiction, lack of subject matter jurisdiction, and failure to state a claim.
2. My statements are made from my direct and first-hand knowledge and experience.
3. I worked for Sheikh Khalid bin Hamad bin Khalifa Al Thani ("Mr. Al

Thani”), Al Anabi Racing USA, LLC (“Al Anabi Racing”), “Al Anabi Racing Limited (“Racing Limited”), Al Anabi Performance, LLC (“AAP”) and Speedtech, LLC (“Speedtech”) for approximately ten years, from July 2008 to July 2018.

1. I was solicited for murder by Mr. Al Thani on or about November 4, 2017, in Las Vegas, Nevada. He solicited me for the same murders again in Beverly Hills, California a few days after the Las Vegas solicitation. I refused. Mr. Al Thani told me that he would not tell me the names of who he wanted killed until I agreed to do it. I asked if it was his assistant, Jason Sharp. Mr. Al Thani smirked and said, “No, not yet.” From November 2017 to July of 2018, I worked for him driving racing rigs and some computer software/fraud programming. Mr. Al Thani contacted me in July of 2018, and asked me to work for him again. He also asked me to recruit employees to work on his behalf, to support the upcoming racing season in the United States and Qatar. When I asked about being paid for the back pay that he still owed me, he told me that unless I agreed to kill the unnamed individuals he previously asked me to kill, I would not be paid because I did not show him loyalty. I once again asked for my back pay, and he again refused. Mr. Al Thani told me that I didn’t “make the cut for his inner circle” and terminated my employment.

2. I worked for Mr. Al Thani in various roles for his various companies, as discussed below. I received tasking from him and others at his direction.

3. I have worked for Mr. Al Thani and his companies, including the Defendants, in the United States, Qatar, Dubai, Bahrain, and Abu Dhabi.

4. A majority of my work, approximately 80%, was performed in the United

States.

5. I worked abroad during the Arabian Drag Racing League¹ season in the Middle East to support the races and build out of cars at the beginning and end of the season. I physically worked at the Qatar Race Club, which Mr. Al Thani owns. Also, I worked in the Middle East wherever Mr. Al Thani wished to race. Mr. Al Thani would periodically request that I return to Qatar work personally for him, aside from the race car duties.

Qatar Work Locations for Defendants

6. Mr. Al Thani owns and built the Qatar Race Club in Doha, Qatar in 2008. Donald Greenbaum's ("Mr. Greenbaum's") Company, Gulf Track Services, built the racing strip at the Qatar Race Club.² The Qatar Race Club has a race track and multiple garages for Mr. Al Thani's personal car collection, and his racing teams' garages. There is also a tower where the corporate-type of staff, such as accountants and travel coordinators, work.

7. In Qatar, each team has its own large garage. In the shop of one of the garages there is a secure space where Mr. Al Thani designs and builds drones that he then ships to Lebanon through the Atat family, who Mr. Al Thani employees.

United States Work Locations for Defendants

8. In the United States, Al Anabi Racing USA, LLC operates out of Mr.

¹ Mr. Al Thani owns the Arabian Drag Racing League, <https://qrc.qa/adr/> (last visited September 11, 2020).

² Refurbishment of the Drag Strip at the Qatar Racing Club, at www.gulftrackservices.com/qrc.html (last visited September 11, 2020).

Greenbaum's personal residence.

9. Al Anabi Racing Limited operates out of Mr. Greenbaum's personal residence.

10. Speedtech and Al Anabi Performance utilize a few different garages, and sometimes operate out of North Carolina and Brownsburg, Indiana.

11. The teams test their cars in Florida, from November to January, due to the good weather that allows for the cars to be run every day. They test and race in Orlando, Bradenton, Valdosta, and West Palm Beach, Florida.

12. Al Anabi Racing, Speedtech, and Al Anabi Performance race all over the United States.

13. To reach the race tracks, employees and Mr. Al Thani arrive via plane, and vehicles. Due to their extended size, Al Anabi Racing's transporters, which are large tractor trailers and toter homes (an RV on a truck chassis that has living quarters, and pulls a trailer), are often required to obtain an overlength permit from the states in which they do business. I have personally obtained these licenses on behalf of Al Anabi Racing at least 10 times.

Employment

14. When I communicated with Mr. Al Thani, it was in person, face-to-face, via WhatsApp messaging, and/or via his email- Sheikh Khalid Al-Thani at alanabiracing@yahoo.com.

15. Throughout my employment, when I was required to travel, Mr. Al Thani

directed me to work with Mona Atat (“Ms. Atat”) for travel arrangements. I would correspond with Ms. Atat via mona-qataracing@hotmail.com. Ms. Atat works for Mr. Al Thani in the tower at the Qatar Race Club in Doha, Qatar. She books airfare, hotel, and arranges for any travel required by Mr. Al Thani’s employees, including me.

16. Throughout my employment, on numerous occasions when I needed assistance related to finances, Mr. Al Thani would often direct me to work with Aman Shahani, who is the Chief Financial Officer for Mr. Al Thani’s companies. I corresponded with Aman via aman@khalthani.com.

17. Throughout my employment, I worked with Mr. Greenbaum when Mr. Al Thani’s vehicles would be shipped to, or from, the United States. I would contact Mr. Greenbaum when I needed to receive payment for outstanding invoices for support of our racing team’s car or parts, and I or other members of our racing team needed to be paid. I handled accounting, including receiving, routing, paying, and requesting payment for invoices on behalf of Mr. Al Thani. Mr. Greenbaum was the person I had to contact to get anything paid.

18. At times, I had State of Qatar-issued work visas. (Exhibit A) At times, I did not. Mr. Al Thani determined when he wanted me to have one, and would take my passport and utilize his connections at Qatari Customs to manipulate the immigration system and have my passport stamped with entry and exit stamps though I had not departed the country. (Exhibit B) For example, I have passport stamps in my passport for the country of Oman; I have never been to Oman. On one occasion, the immigration officials incorrectly placed Plaintiff Robert Von Smith’s (“Mr. Smith”)

visa stamp in my passport. (Exhibit C) Because Mr. Al Thani is a member of the royal family of Qatar, immigration visas were permissively enforced. I was even granted a “government official” work visa when Mr. Al Thani wanted me to have one.

19. I have been paid by various entities in various different ways. Payment for employment was never consistently paid by the same business entity or the same person. I have been paid by direct deposit, check, wire transfer, credit card, and cash.

20. I was paid via bank wire from Qatar Race Club, which Mr. Al Thani owns and built for his personal and commercial use in Doha, Qatar. (Exhibit D)

21. I was paid \$3,450.00 USD by Mr. Greenbaum from Al Anabi Racing Limited. I received a 2017 IRS Form 1099-MISC from Mr. Greenbaum that shows “Al Anabi Racing Limited” as the payer, and Mr. Greenbaum’s home address, 27 Pill Hill Lane, Duxbury, MA 02332” as the address. (Exhibit E) The phone number listed, (781) 934-5534, is Mr. Greenbaum’s personal cellular phone. The payment noted in the 1099 was for work performed on behalf of Speedtech, LLC. At Mr. Al Thani’s request, I hauled a truck and trailer towing one of Speedtech’s cars to Speedtech’s shop in Brownsburg, Indiana. (Exhibit F) In addition to the \$3,450.00 I was paid by Mr. Greenbaum, I was also paid \$3,000.00 USD in cash by Jason Sharp, who is an assistant to Mr. Al Thani; I was told by Jason Sharp not to tell Mr. Greenbaum that I had also been paid in cash because Mr. Greenbaum and Mr. Al Thani had, at the time, instituted a cap policy where Mr. Greenbaum would not pay

anyone above a certain cap for certain types of jobs, regardless of the cost or what was owed, and the cost to pay me for this trip was above \$3,500.00 USD.

22. I was paid two payments of \$2,500.00 USD via credit card by Jason Sharpe, utilizing Joseph Jourieh's³ credit card, via Square, on October 25, 2017, and October 26, 2017. (Exhibit G) Square charged \$87.65 in service fees for each transaction, and the total amount deposited was \$4,824.70. Mr. Al Thani asked me to work in Las Vegas, Nevada in 2017, to help with one of the races. I agreed to travel to Las Vegas, Nevada, but required Mr. Al Thani to pay me up front for the work. I traveled with a Square payment terminal that I already had from a business that I use to run, and Jason Sharp paid me with Joseph Jourieh's credit card on arrival.

23. When I was paid cash, it was directly from Mr. Al Thani, and Jason Sharp.

24. I was paid cash when I was physically in the United States as well as in Qatar.

25. When I was hospitalized after Mr. Al Thani gave me what he thought was an aspirin, but it turned out to be something from Mr. Al Thani's personal stash of drugs, Mr. Al Thani paid for my private hospital stay. (Exhibit H)

26. I was hired to work for Mr. Al Thani in July 2008 by Mr. Howard Moon ("Mr. Moon") in Oak Ridge, Tennessee, who at the time, was building a racing team for Mr. Al Thani.

27. At the time of my hiring, Mr. Al Thani owned two pro mod teams; the

³ Joseph Jourieh is the Director of Public Relations for the The State of Qatar to the United Nations.

first one was a Nitrous promod team that was tuned by Shannon Jenkins (“Mr. Jenkins”) and driven by Mike Castellana (“Mr. Castellana”), the second one was a Supercharger promod team that was tuned by Mr. Moon and driven by Von Smith. Both teams were known as the “Awesome Al Anabi Racing” teams. (Exhibits I, J)

28. At the beginning of my employment, for the first few months I had little interaction with Mr. Al Thani, and received my job duties from Mr. Moon as part of the supercharger team. My job duties at this time included driving the transporters, which are large vehicles that move the racecars from one location to another (Exhibit K), data and video acquisition (Exhibit L), coordinating logistics for the crews and the cars, bookkeeping including payroll at Mr. Al Thani’s direction and approval (For example, Exhibit M, an email from Mr. Al Thani’s Chief Financial Officer at the time, Abdullah Hussiba, setting our salaries that had been approved by Mr. Al Thani). I also cooked for the team at the various tracks. (Exhibit N)

29. I was first introduced to Mr. Al Thani in October of 2008 by Mr. Moon at a car race in Englishtown, New Jersey, called “Shakedown at Etown.” This race was Al Anabi’s first racing win in the United States. (Exhibit O)

30. Mr. Al Thani introduced himself to me at Shakedown at Etown as the owner of Al Anabi Racing. During my initial meeting with Mr. Al Thani, he talked about the objectives of going to Bahrain to race, and his new racetrack in Qatar⁴ that

⁴ Mr. Al Thani owns the Qatar Race Club, available at <https://qrc.qa/about-qrc/> (last visited September 1, 2020).

would be finished by the end of 2008. He said he was excited to have me be a part of his team.

31. After approximately six months of just working on the car for his team, I was given more responsibility by Mr. Al Thani. From that moment, my job duties changed day to day for the remainder of my employment.

32. When I was working in the United States, I would receive my job duties/tasking from Mr. Moon.

16. When I was working in Qatar, I would receive my job duties/tasking related to Mr. Al Thani's cars from Mustafa Atat ("Mr. Atat"), who worked in the shops of Al Anabi Racing, Al Anabi Performance, and Speedtech on the Qatar Race Club campus; and Jason Sharpe, who is Mr. Al Thani's assistant; and Mr. Al Thani himself.

33. At one point, I became so frustrated as to the various individuals tasking for various job duties that I even went to Mr. Al Thani and asked, "What the hell is going on? I am working in our shop getting directions from Moe for public relations and for video acquisition for the cars. I am getting instructions from Jason to do things for you like exercise your guard dogs and maintain your motor homes. And, you are telling me to build drones, run software, and answer calls at all hours of the night. Who am I supposed to report to?" Mr. Al Thani responded, "You are working for me. It doesn't matter what any of those motherf*ckers ask you to do. You do what I ask. You work for me."

34. After that discussion, I still received tasking and instruction from multiple individuals but prioritized Mr. Al Thani's requests.

35. In addition to my previous job duties related to my original race car team, I was also asked by Mr. Al Thani, when I was working in Qatar, to build and establish a new concession stand at the Qatar Race Club. I have owned a barbecue restaurant and a pastry shop, and he asked me to help him set up a new concessions stand. He promised me a percentage of the sales of the concession stand; he never paid me for any of the sales.

36. I was also asked to create promotional videos and materials, and maintain Mr. Al Thani's racing rigs.

Background to Design of Promotional Material and Badging

37. To promote his teams and himself, Mr. Al Thani always had his vehicles, trailers, clothing worn by staff, and promotion materials include his name, "KH," and his companies' names.

38. "KH" is a trademark that Mr. Al Thani owned, and it stands for "Khalid Hamad." KH is Mr. Al Thani's brand, and it is on practically everything that Mr. Al Thani owns, including his racecars, private cars, the clothing of the racecar drivers, pit crews, medical staff, and private security.

39. Mr. Al Thani also owned the trademark "Al Anabi."

40. On countless occasions Mr. Al Thani bragged about owning Al Anabi Racing, Al Anabi Performance, and Speedtech. On our initial uniforms, when Mr. Al Thani first started racing, the crew pants had "Al Anabi Racing" down the side of the pants. These cost \$2,000 a pair. The right pocket of the pants has "KH." Mr. Al Thani

use to joke that he had “branded” us like cattle, with “KH” on our butts. He constantly bragged about his ownership. KH is on everything.

41. Crew members were required to wear badging when racing. The badges have the words “Qatar Race Club,” “KH” and “Al Anabi Racing,” “Qatar” and the Qatari flag and sometimes the American flag. (For example, Exhibit P). After Khalid purchased Speedtech, they would frequently have card with “Speedtech” badging. (See Exhibit P, badge on the left).

42. The cars raced by Defendants include the same type of badging.

43. The trailers utilized to tow racecars always had the badging “KH,” “Qatar,” “Al-Anabi Racing” and “AAP.” They were frequently painted in maroon or a red hue. (Exhibit K)

44. “KH,” “Al Anabi” and the Qatari flag were prominently displayed on every vehicle. After Mr. Al Thani purchased Speedtech in 2010, he would then place “Speedtech” on vehicles, even if they were in a race car class that did not utilize the technology.

45. The trophies that we won at races in Qatar were the physical likeness of Defendant Khalid Al Thani made from his hero card. (Exhibit Q)

46. After winning a race, to celebrate the win, racecar drivers were often draped in the colors of Qatar. (Exhibit R)

47. At Mr. Al Thani’s request, I have personally prepared over 100 public relations materials for Defendants. Some of the promotional material I was asked to create and/or promote were videos for social media. The videos I created

and/or promoted were, and still are, featured on the Qatar Race club social media outlets, National Hot Rod Association (NHRA), Qatari media outlets, and United States media outlets. I filmed video at various race tracks. Before these were cleared for publication and media use, these videos were approved by Mr. Al Thani. These videos state that he owns Al Anabi Racing, USA, AAP, and Speedtech. (Exhibit S)

48. In the public relations role, Mr. Al Thani asked me to create Al Anabi Racing “hero cards” or “autograph cards,” which are cards designed to promote a race team. The hero cars were designed in accordance with Mr. Al Thani’s input and requests, including the color and graphics he preferred. I would create a mock design, and route it to him for approval. He would provide edits; I would make his edits and then route them back to him for final approval. He would approve them, or have more edits, and then I would place the order with funds provided by him. The hero cards that Mr. Al Thani asked me to create specifically state that he is the owner of Al Anabi Racing (Exhibit T)

49. Exhibit T is an example of a hero card that Mr. Al Thani had me make for our particular team. One side has the picture of our car, with a picture of Mr. Smith and Mr. Moon. Mr. Moon was our crew chief. On the car there is badging that says “KH,” “Al-Anabi Racing,” “Qatar,” and Mr. Smith’s racing number- 2377. Underneath the picture of our car, is has the names and logos of “Al Anabi Superchargers, Inc.,“ the Qatari flag, “Al Anabi Racing,” “Qatar Race Club,” and “KH.” The reverse side describes the crew, including me, and Mr. Al Thani. The reverse side states that Sheikh Khalid is a member of the ruling family of Qatar, and

owns the Al Anabi Racing team. It talks about his efforts to promote racing in Qatar. Alongside his title of “Team Owner: Sheikh Khalid Bin Hamad Al Thani,” is a picture of Mr. Al Thani wearing an Al Anabi Racing hat. Mr. Smith’s description also states that Mr. Al Thani owns Al Anabi Racing.

50. Exhibit U is another example of a hero card. This card was made especially for Mr. Al Thani. The front of the hero card is a picture of him wearing an Al-Anabi Racing firesuit, with his initials of KH on the right arm. His helmet has “Qatar,” and “KH,” badging on it. The slightly off-center words of the car read, “Al-Anabi Racing,” and “Qatar Racing Club” with the Qatar Racing Club’s logo in the top right corner. The car in the picture is an Al Anabi Racing car, with the badging “Al-Anabi Racing,” “KH,” “Qatar,” and Mr. Al Thani’s favorite number, “9.”⁵ The back of this card has the logos of “Al Anabi Racing,” and “Qatar Racing Club,” the Qatar Racing Club Doha address, and three pictures of the Al Anabi Racing car with the Al Anabi Racing badging.

51. Exhibit V is an example of a press release that Mr. Al Thani asked me to put together and push out to the media. I did these regularly for our team. I would draft the Word document and recommended a photograph. In the same way that I would create the hero cards, I would draft and release press releases to Mr. Al Thani for his approval. I would put together a draft, and then send it to Mr. Al Thani for approval. He would then review and it he would provide me with any edits. I would

⁵ Racecar drivers frequently race with their numbers on the car, either on a window or on the actual body of the car.

make the edits, and then send it back to him for final approval. After he approved it, I would then send the document and photograph out to the media. Exhibit V describes Mr. Al Thani as the owner of Al Anabi Racing, with Mr. Smith holding the winning trophy on the podium at the Qatar Race Club. Mr. Al Thani had just handed Mr. Smith the trophy on the podium. Mr. Al Thani is standing in a thobe directly in front of Mr. Smith.

52. The wraps for the Al Anabi, Al Anabi Performance, and Speedtech cars are designed by Mr. Al Thani. The hero cards that I just described were designed off the race car design. Prior to 2014, Mr. Al Thani frequently requested maroon to support the country of Qatar. Maroon is the color of the country of Qatar, and Mr. Al Thani was trying to promote his country when he raced.

53. After 2014, in an effort to distance himself from the Al Anabi Racing USA, LLC debt collection issues (discussed below), and in an effort to rebrand his teams, Mr. Al Thani began to use silver and black and orange. After Mr. Al Thani bought Speedtech, LLC, he continued to use blue because Mr. Jenkins, one of the original owners of Speedtech, LLC, had successfully marketed Speedtech as the “Ice Man,” since the technology behind Speedtech is nitrous, which is known for being cold.

54. Mr. Al Thani would frequently try to match graphics on his various teams. For example, he had two of his cars wrapped utilizing the same graphics so that both Al Anabi vehicles matched. (Exhibit W)

55. Mr. Al Thani also had an Al Anabi Performance car wrapped the same way as his private motorcycle. (Exhibit X)

56. In an effort to get his team names out there, Mr. Al Thani had the name of Speedtech, LLC emblazoned on a vehicle that does not even use the technology that Speedtech provides to that class of racecar.

Formation and Ownership of Mr. Al Thani's Companies

57. Mr. Al Thani started Al Anabi Racing in 2007.

58. In 2007, Mr. Al Thani contacted Mr. Jenkins of Speedtech, and asked for nitrous motors for some hill climb racing that is very popular in the Middle East. After talking with Mr. Jenkins about motors and his desire to build racing teams, at Shannon Jenkin's recommendation, Mr. Al Thani contacted Alan Johnson of Alan Johnson Racing.

59. Alan Johnson was hired to manage and compete for Al Anabi Racing, and has publicly stated that Al Thani owns Al Anabi Racing.⁶

60. Thereafter, Mr. Al Thani consulted with Mr. Jenkins to build other

⁶ Announcement of Alan Johnson and Mr. Al Thani working together to promote Al Anabi Racing, Arab Sheikh Funds U.S. Racing Team, at <https://www.reviewjournal.com/news/arab-sheikh-funds-u-s-racing-team/> (last visited September 11, 2020); Alan Johnson stating in a press release, ““We enjoyed our six years with Al-Anabi Racing, and we experienced great success,” Johnson said in the press release. “We appreciate the opportunity to compete for Al-Anabi Racing and thank Sheikh Khalid for everything he did for us,” at NHRA: Alan Johnson Racing moves forward without Al-Anabi,” available at <https://motorsports.nbcsports.com/tag/al-anabi-racing/>; and Alan Johnson Getting Back on Track, Santa Maria Times at https://santamariatimes.com/sports/motor-sports/alan-johnson-getting-back-on-track/article_2cc18f5c-108e-541e-8dd4-4b5c4b453dd4.html (last visited September 11, 2020).

teams; Mr. Moon and Mr. Smith were recommended, and Al Anabi Racing was established and began competing.

61. In its infancy, Al Anabi Racing employees were paid through the Qatar Olympic Committee and the Ministry of Sports on behalf of Al Anabi Racing and QRC. We used to joke that we were Olympians since the source of some of our funding was from the Olympic Committee. None of us were Olympians and we worked solely for Mr. Al Thani and his teams.

62. The Olympic Committee initially funded us at the beginning of racing because Mr. Al Thani was part of the Government of Qatar's effort to bring sports into the country. Mr. Al Thani was permitted to include race car driving in some of the budgets from the Olympic Committee. I personally prepared the budgets for our Al Anabi Racing to provide to the Government of Qatar's Olympic Committee. When preparing the budgets, I would budget what our race team would need for the year from the cost of the staff, hotels, per diem, and travel to the cost of operating the cars, from parts to fuel and everything in between. I would provide the proposed budget to Mr. Al Thani. He would review it. He always asked me to triple or quadruple the budgets, to pad his personal accounts. I would then modify the budget as he requested. Mr. Al Thani then routed the budget to the Olympic Committee and/or The Ministries of Sports where it would be funded.

63. The funds would then be provided by the Government of Qatar to Sheikh Khalid. I maintained the books and continued to prepare the budgets for our team. I have personally watched him squander millions of dollars of our allocated budget on

supercars for himself, including but not limited to a carbon-fibre Bugatti Veyron, Rolls Royce Phantoms, Ferraris, a GT 40, several Maybachs, a Mercedes Benz McLaren, a black ZR1 Corvette,⁷ several Porsches, a custom-made diamond bezel watch, a pair of \$1,000,000.00 USD “KH logo” cufflinks, and designer shoes, and leave nothing left to his employees.

64. Employees of Al Anabi Racing stopped being paid by the Qatar Olympic Committee because of the Fédération Internationale de Football Association (FIFA) soccer cup scandal involving Qatar’s bid for the 2022 FIFA World Cup. Based up on discussions I was a part of with Mr. Al Thani and, a member of the Olympic Committee during budget meetings, I think that the Olympic Committee caught on to Mr. Al Thani’s misuse of funds allocated for sports.

65. Thereafter, the funding for employees was overseen by The Ministries Of Sports. Then, it was paid from Mr. Al Thani and his companies, including the Qatar Race Club, through Mr. Greenbaum.⁸

66. The Government of Qatar promotes Mr. Al Thani as the owner of Al Anabi Racing, and highlighted it as an example of how Qatar could work with the United States in business in sports. (Exhibit Y)

67. Mr. Al Thani started Al Anabi Racing and Al Anabi Performance, LLC

⁷ Donald Greenbaum procured this car for Mr. Al Thani using Gulf Track Services. They both bragged about the value of it, since it was purchased for Mr. Al Thani before the car was even produced. *See also*, <http://www.gulftrackservices.com/>. (last visited September 8, 2020).

⁸ Mr. Al Thani owns KH Holding, LLC.

from scratch. I was one of the original team members who helped build these teams.

68. Mr. Al Thani purchased Speedtech, LLC from Mr. Jenkins and Mr. Castellana.

69. Mr. Castellana still drives for Mr. Al Thani, and publicly states that Mr. Al Thani is the owner of the Al Anabi Racing car that Mr. Castellana drives. (Exhibit Z)

70. Mr. Castellana is also a current or former corporate officer for many of Mr. Al Thani's companies. I believe Mr. Al Thani uses Mr. Castellana as a corporate officer because Mr. Al Thani employs Mr. Castellana and he can control him. Mr. Castellana knows Mr. Greenbaum. (Exhibit PP)

71. Based upon my personal interactions and discussions with Mr. Jenkins, it is apparent that he and Mr. Al Thani had a following out of some sort. Mr. Jenkins retreated from racing for quite some time. I have not seen Mr. Jenkins actively involved in the racing industry in the last year and half. I think Mr. Al Thani uses Mr. Jenkins as a corporate officer because Mr. Al Thani wants to hide behind him, and that was a part of their agreement when Mr. Al Thani purchased Speedtech from Mr. Jenkins and Mr. Castellana.

Fraud

72. When Mr. Al Thani first started racing in the United States, he hired Alan Johnson Racing to run his teams. (See Exhibit S) In 2015, Al Anabi Racing stopped working with Alan Johnson Racing. Mr. Al Thani stopped funding Alan Johnson because Mr. Al Thani got into an argument with the royal family, and they cut off his

funding. Based upon the discussions I had with Mr. Al Thani, I think his family caught on to him stealing money from the Olympic Committee and the Qatar Race Club to use for his own personal use, and they cut him off financially. He had to go apologize to his family before they allowed him his monthly allowance again. They took him out of the position of Minister of Sports. It took several months for Mr. Al Thani to apologize. I was personally in Doha, Qatar after this happened. Me, and other employees, including Jason Sharp, encouraged him to just apologize so we could get back to doing what we love- racing.

73. When Mr. Al Thani was cut off financially, he owed a lot of people money and the amounts were very large. He still wanted to race but could not afford it. People would come up to him directly, and ask for their money. I have personally observed very heated discussions between vendors, team members, and Mr. Greenbaum and Mr. Al Thani about the money Mr. Al Thani owed them. For many months, Mr. Al Thani would say, "Talk to Don. He will work it out." Eventually people figured out that Mr. Al Thani was not paying anyone. Mr. Greenbaum knew Mr. Al Thani owed people money because Mr. Al Thani sent them all to him. Mr. Greenbaum would sometimes pay employees and invoices. Sometimes he wouldn't. Mr. Al Thani started hiring more security private personnel security to accompany him at the races, and he made it very difficult to get to him and talk to him.

74. The amount of money he owed to people in the racing world eventually caught up with him and he publicly pulled out of racing.

75. The rebranding of Al Anabi Racing to Al Anabi Performance is a

smokescreen to hide from liability in the United States. Because Mr. Al Thani was using Al Anabi Racing USA, LLC for everything when he got cut off, when he got back into racing after his family allowed him to have his allowance again, he started Al Anabi Performance, also known as “AAP.”

76. Mr. Al Thani personally told me that he wanted to become the dominant player in racing in the Middle Easter and had to race under a different name to clean up what happened.

77. When we first started racing again, no one knew what AAP was. Mr. Al Thani did that on purpose. He purposefully disconnected himself so that he could hide. For about a year and a half, Mr. Al Thani would remain in Doha, Qatar, and send Mr. Greenbaum in his place. Mr. Al Thani personally described Mr. Greenbaum as his “eyes and ears.” We could race anywhere and no one asked about Mr. Al Thani or asked for the money he owed them. We could just race. Mr. Al Thani would watch the races online, and would call me to tell me what to relay to the teams to tune the cars. During races, he would sometimes call 10 times, “Do X to the car,” “The car is doing X. Fix this.” “Tell Von to X.” If I didn’t answer, he would call Mr. Greenbaum, who would come to the pit and tell us what Mr. Al Thani had said.

78. When Mr. Al Thani bought Speedtech, he hid it for the exact same reason he hid his ownership of AAP.

79. Mr. Greenbaum covers up for Mr. Al Thani and runs his corporations. so that Mr. Al Thani can avoid being responsible for anything.

80. Eventually, Mr. Al Thani began to feel more publicly comfortable

associating himself with his teams again. He started returning to the races. He started putting “KH” back on his cars.

81. Mr. Al Thani faced another scandal besides dropping out of racing for financial reasons. After America’s Most Wanted featured an episode regarding Mr. Atat, who is an employee and race car driver for Mr. Al Thani and wanted for murder in the United States, Mr. Al Thani issued a statement as the owner of Al Anabi Racing regarding his position on hiring Mr. Atat. (Exhibit AA) I was physically sitting next to Mr. Al Thani when this statement was issued by his attorney in London, England; Mr. Al Thani laughed and said, “that should shut them up for a while.”

82. I personally observed Mr. Atat continue working for Mr. Al Thani, and Mr. Al Thani told us not to take videos and pictures of Mr. Atat working for him. Mr. Atat continues to work for Mr. Al Thani.

Mr. Al Thani’s Involvement in His Companies and Teams

83. When we were racing abroad, I would pick up and save Arabic newspapers and sporting publications, some of which were printed by the Government of Qatar, that had written about Mr. Al Thani and his teams. The articles described Mr. Al Thani as the owner of Al Anabi Racing. (Exhibit BB)

84. Throughout the course of my employment, Mr. Al Thani would boast and brag to those in the racing industry, commercial partners, vendors, individuals at social events, during employment-related meetings, to the media, to his paramours,

and to potential employees that he sought to hire that he was the owner of these teams, and that he had hired the ultimate dream teams in racing.

85. Mr. Al Thani is hands-on in all aspects of how his teams perform. He hand-selects the drivers of his cars and is the ultimate decision maker in deciding who is hired and who is fired. I have sat at the same table alongside him during at least ten meetings where teams were created and dissolved. He asked my opinion on several occasions if someone would be a good fit for our team. Mr. Al Thani is the decision-maker. He consults with other team members as to who is the best fit for a team, but all employment hiring decisions are made by him.

86. Mr. Al Thani decides who does or does not drive his cars, and the type of car each driver drives. (See also, for example, Del Worsham's statement when he won the National Hot Rod Association Championship.⁹)

87. Mr. Al Thani decides where his cars will race and test, including when they will race in the United States and the Middle East. He holds the purse strings and decides when and where we raced.

88. Mr. Al Thani has control of the crew members who are a part of

⁹ National Hot Rod Association (NHRA) 2011 Year in Review, Del Worsham Wins Championship, at <https://www.youtube.com/watch?v=fz8IsKRaztg&feature=youtu.be>, Al Anabi Racing winning the championship in 2011, (beginning at 2:46), Al Anabi Racing driver Del Worsham thanking Sheikh Khalid, "for first and foremost building this team and giving me the option to drive and Alan Johnson for hiring me and believing in me. (beginning at 3:41).

each his team. He speaks with them personally, relaying his likes and dislikes for his cars. He meets with them in the pit area before, during, and after races. (For example Exhibit CC)

89. At the races, Mr. Al Thani hosts hospitality tents where he and his family, guests, and friends socialize before, during, and after the races. I have personally cooked for his family and the crew on at least 100 occasions while we were racing. Mr. Al Thani is Muslim and I was not permitted to cook pork while cooking for him and his family. I had an Arabic-speaking assistant who would help assist in cooking; we were given specific instructions on what to cook during Ramadan. (Exhibit DD)

90. Mr. Al Thani employs racecar drivers from the United States, Qatar, Dubai, and Lebanon. When the teams are racing in Qatar, the racecar drivers sometimes live in Mr. Al Thani's personal residence, called the Majils.

Shipping to and from Massachusetts and the United States

91. When the middle east car racing season is in full swing, from November to March, Mr. Al Thani ships everything racing-related from the United States to Qatar. When the United States racing season begins, Mr. Al Thani ships everything from Qatar to the United States.

92. Mr. Al Thani frequently imports cars, parts, and personal items from the United States from Mr. Greenbaum.

93. Mr. Greenbaum uses Aurum Telemedia and Al Anabi Racing

USA, LLC, both Massachusetts companies, to ship and receive goods from Mr. Al Thani. Mr. Greenbaum will use shipping accounts, and sometimes addresses, for Aurum Telemedia and Al Anabi Racing USA, LLC. Items are often shipped via Qatar Airways. (Exhibits EE, FF, GG, HH)¹⁰;

94. I have personally gone, at Mr. Greenbaum's direction, to pick up cars that Mr. Al Thani shipped to the United States through Mr. Greenbaum and Aurum Telemedia. (Exhibit II)

95. Mr. Al Thani purchases cars, parts, and public relations materials in the United States and either uses them for his cars here or ships them to Doha, Qatar. (Exhibits JJ, KK, LL)

96. Al Anabi Racing's pro mod cars and trailers come from the United States, including the parts, unless they are custom made by Mr. Al Thani in Qatar.

97. I personally maintained two of the \$1,000,000.00 USD plus trailers built by Competition Trailers for Mr. Al Thani. Whenever we needed a new part, I would order it and have it shipped to Doha, Qatar or a location in the United States. (Exhibit MM) The invoice addressed to Mr. Al Thani from Competition Trailers uses an address for Tim McAmis racecars, who builds cars for Mr. Al Thani. They later ship items to Doha, Qatar, where I personally received it in Doha, Qatar.

¹⁰ The Manufacturer number for this bill of lading is QASHEKHA2491DOH. Mr. Al Thani gave his vehicles, including motorcycles, custom manufacturing numbers, and included his personal identifying information. He typically included references to his wife. In this manufacturing number, the "QA" stands for "Qatar." The "SHEKHA" part is a tribute to his wife; "sheikha" is the Arabic word for princess. The "DOH" stands for Doha, as in Doha, Qatar.

98. I personally unpacked items in Doha, Qatar, that were shipped by Mr. Greenbaum to Mr. Al Thani, Al Anabi Racing USA, LLC, Al Anabi Performance, and Speedtech.

Donald Greenbaum

99. Mr. Greenbaum handles Mr. Al Thani's United States corporations for him. On numerous occasions over the course of my employment, Mr. Al Thani described Mr. Greenbaum as his person in the United States who ran everything on paper. Mr. Al Thani said Mr. Greenbaum keeps him safe. He would comment that Mr. Greenbaum was his "personal Jew" and "you know good Jews are with hiding money."

100. Mr. Greenbaum is person that Mr. Al Thani would refer employees to when Mr. Al Thani had problems with funding or tracking his money.
(Exhibit NN)

101. As part of his job duties, Mr. Greenbaum ensures that the car transporters comply with Department of Transportation regulations, and comply with legalities of importation to Qatar. Mr. Greenbaum's personal address is utilized for Al Anabi Racing USA, LLC's Department of Transportation number 92166588). Al Anabi Racing USA, LLC is listed as a transporter for private vehicles, and is not available for public hire.

102. Mr. Greenbaum personally handled the employer-required drug

testing I was required to complete as a holder of a commercial driver's license. He would request that I complete the testing at regular intervals throughout my employment.

102. Mr. Greenbaum paid for the insurance for the team cars for Al Anabi Racing. (Exhibit OO)

Human Trafficking

103. Throughout my employment, Mr. Al Thani would withhold my passport. He would withhold the employer-sponsored visa required to exist from Qatar until I, "behaved enough," or had completed job tasks that he asked. For example, on at least two occasions, he would not allow me to return to the United States for two months until a drone that I had ordered for him had been received, and surveillance equipment that he has asked be installed in his house had arrived from Mr. Greenbaum, and was installed by me.

104. I was not initially required to sign a non-disclosure agreement. After approximately five years after working for Mr. Al Thani, I was forced to sign a non-disclosure. I initially refused, and then Mr. Al Thani pulled out a gun, pointed at my head, and said, "Stop being difficult. Sign the motherf*cker." I signed the non-disclosure agreement. When I asked for a copy, he responded, "F*ck off."

105. There are Filipino, Nepal, Morroco, and Indian workers that work in the Al Anabi Racing garage at the Qatar Race Club. There are Australian, Hungarian, and eastern European workers that work in other parts of the Qatar Race Club. There are Filipino, Indian, Nepalese, Pakistani, and Kenyan workers who work

at the Qatar Race Club that are being held against their will. Mr. Al Thani separates the groups of workers by nationality. Wahid is the manager of the Indian migrant workers. Romeo is the manager of the Filipino migrant workers. Dom is the manager of the Filipino migrant workers inside the Qatar Race Club tower. Mr. Atat supervises the workers inside the Qatar Race Club. Muhanna Al Naimi supervises Mr. Atat.

106. In the Qatar Race Club tower, there are approximately four or five Filipino workers. The workers in the tower are professional-types There are Egyptian and Pakistani accountants, some of who are college-educated. Some of them have engineering degrees. Ms. Atat works inside the tower. There are also computer and IT staff as well as accountants.

107. I have personally observed the process that Mr. Al Thani uses when migrant workers who are working at the Qatar Race Club arrive into the country of Qatar. When the workers arrive and depart from the country of Qatar, there is a member of the Qatari government present and waiting for them. When the workers enter, as soon as the workers have cleared customs, a Qatari government official confiscates their passports. The workers are then taken via van to the Qatar Race Club. They work and live at the Qatar Race Club.

108. The passports of the workers at the Qatar Race Club are kept in a 3' x 4' wall safe. They are stored stacks by nationality. I had access to the wall safe when I would retrieve money for our team from the accountants.

109. The workers are given a three year contract. They work for one year

and the ones that “behave” are given one month off to go home. Mr. Al Thani will hire several people from the same family, and if a family member does not return, the remaining family members are threatened, and beaten. After three years, a worker can stay or go home.

110. I personally observed Mr. Atat physically and verbally abuse the workers. The workers are scared of death of him. I have personally observed Mr. Al Naimi physically and verbally abuse the workers. Ms. Atat was verbally abusive to the Filipino workers, and talks to them like they are pieces of garbage.

111. I have seen firsthand Mr. Al Thani utilize a dog shock collar to demonstrate his power to the workers. He used an Indian worker to demonstrate what he would do to anyone who crossed him. He placed the shock collar on the worker who had abused Mr. Al Thani’s dog, and shocked him. When Mr. Al Thani did this, he lined up all the physical laborers, approximately 10-15 people, at his personal residence, and made them watch.

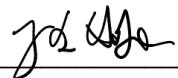
112. I have been personally approached by at least four workers and asked to assist in helping them exit the country. Our racing team tried to get some of the workers to come to the United States but Mr. Al Thani shut it down and said “you are not taking any of my people to the United States.”

113. I have personally paid for rice for the workers to eat. I have taken them to the grocery store to buy fruit. We would offer them lunch that we were eating, that they had cooked and brought to us. I have taken them to restaurants and the

grocery store. I have, on at least 100 occasions, provided money, food, groceries, and snacks, to the migrant workers of Mr. Al Thani.

114. Our team would pay the workers that helped us, especially when we won. Romeo worked with our team. When we traveled out of Qatar to race, only the head workers, Romeo, Wahid, and Dom, were permitted to travel. When they depart Qatar, Mr. Atat stands at the customs counter when they enter and exit Qatar, to retrieve their passports.

Pursuant to 28 U.S.C. §1746, I state under penalty of perjury that the foregoing is true and correct. Executed on 14th day of September 2020.



TERRY HOPE